

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

ECOLAB Inc., and NALCO COMPANY,
LLC d/b/a Nalco Water, an Ecolab Company
and/or Nalco Water,

Plaintiffs,

No. 3:23-cv-00102

v.

JESSICA GRAILER,

Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A
RESPONSE TO DEFENDANT GRAILER'S MOTION TO COMPEL**

Plaintiffs EcoLab, Inc. and Nalco Company, LLC (collectively “Plaintiffs”), by and through the undersigned counsel, hereby submits their *Unopposed* Motion for an Extension of Time to File a Response to Defendant Jessica Grailer’s Motion to Compel Supplemental Response to Interrogatory No. 4. In support of their Motion, Plaintiffs state as follows:

1. On June 9, 2023, Defendant Jessica Grailer filed a Motion to Compel Supplemental Response to Interrogatory No. 4. [ECF No. 57].
2. Plaintiffs’ deadline to file a response in opposition to Defendant’s Motion to Compel is June 16, 2023.
3. Plaintiffs’ counsel is unable to finalize and file a response to Defendant’s Motion to Compel by the current deadline of June 16, 2023 because of the time needed for Plaintiffs’ to review the response prior to filing, and, instead, is requesting until June 20, 2023, to file their response.
4. On June 14, 2023, Defendant Grailer’s counsel, Johanna Wilbert, indicated that Defendant Grailer did not oppose the relief requested in this motion.

5. This is Plaintiffs' first request for an extension of time to respond to Defendant Grailer's Motion to Compel. As set forth above, this extension is not being sought for the purpose of delay or for any improper purpose. No party will be prejudiced if the Court grants this motion.

6. In light of the foregoing, Plaintiffs respectfully request that this Court extend the deadline for Plaintiffs to respond to Defendant Grailer's Motion to Compel until June 20, 2023. A proposed order granting this motion is being submitted contemporaneously.

WHEREFORE, Plaintiffs EcoLab, Inc. and Nalco Company, LLC respectfully prays that the Court grant their *Unopposed* Motion and issue an Order extending the deadline for Plaintiffs to file a response to June 20, 2023.

Dated: June 15, 2023.

Respectfully submitted,

/s/ Daniel F. Lanciloti

Daniel F. Lanciloti (admitted *Pro Hac Vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on the 15 day of June 2023, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system and was served on the following by U.S. mail and by email to:

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Respectfully submitted,

/s/ Daniel F. Lanciloti